Dominion Resource Services, Inc.
5000 Dominion Boulevard, Glen Allen, VA 23060

dom.com

BY OVERNIGHT MAIL
RETURN RECEIPT REQUESTED

March 9, 2015

Mr. Shawn Crist
Department of Environmental Quality
Blue Ridge Regional Office
7705 Timberlake Road
Lynchburg, VA 24502

RE: Clover Power VPDES Permit VA0083097
Five-Day Notification Letter

Dear Mr. Crist:

The following information is in follow-up to verbal and email notifications made on March 7, 2015 at 12:15 and 12:41 PM, respectively concerning a potential discharge of cooling tower mist to the drainage area associated with storm water outfall 004 at our Clover Power Station.

1. **A description of the nature and location of the discharge:** The potential discharge was associated with the Unit 1 cooling tower at the Clover Power Station. Mist from the U1 cooling tower fell upon the adjacent ground, combined with snow melt and stormwater runoff from recent precipitation events, and entered a ditch that feeds a creek and the storm water pond ("stump pond") associated with the station's Outfall 004.

2. **The cause of the discharge:** Generating Unit 1 came off-line on Thursday morning, March 5, 2015. As a result, the fans in the U1 tower were stopped at some time during the afternoon of March 5, but cooling water flow to the tower continued. The fans were stopped because air temperatures were below freezing and operation of the fans under these conditions could have resulted in the build-up of ice within the tower and the collapse of the tower cells. As stated above, mist from the U1 cooling tower fell upon the adjacent ground, combined with snow melt and storm water runoff from recent precipitation events and entered a ditch equipped with a concrete berm and release valve that were constructed specifically to contain releases of cooling tower basin water should such an event occur. However, storm water and snow melt from recent precipitation events, when combined with the cooling tower mist, resulted in sufficient volume to overflow the ~1,000 gallon containment.

3. **The date on which the discharge occurred:** March 5-6, 2015

4. **The length of time that the discharge continued:** The cooling tower mist and overflow of the ditch containment were observed by the station's Environmental Compliance Coordinator at approximately 7:00 AM on March 6. The station immediately took actions to bring in a portable pump, which was used to pump the water from the containment to the cooling tower basin. The discharge ceased at approximately 9:00 AM on March 6.

5. **The volume of the discharge:** The flow over the containment was observed to be approximately one gallon per minute. The exact volume of the discharge is unknown due uncertainty in the exact time of initiation of the cooling tower release and the relative contributions of storm water and snowmelt. It is believed that the volume of cooling tower mist discharged was approximately 50 gallons.

6. **If the discharge is continuing, how long is it expected to continue:** Not Applicable

7. **If the discharge is continuing, what the expected total volume of the discharge will be:** Not Applicable

8. **Any steps planned or taken to reduce, eliminate and prevent a reoccurrence of the present discharge or any future discharges not authorized by this permit:** As noted above, the station had previously created containment in the ditch adjacent to the cooling tower by installation of a concrete berm and release valve. They had also put in place a procedure to keep the cooling tower fans running during periods when Unit 1 was offline in order to prevent mist from landing on the adjacent ground from the cooling tower. However, during the current incident the fans could not be kept in service because air temperatures were below freezing. To prevent similar future events the station intends to replace the cooling tower bypass headers which is scheduled to take place during our current planned maintenance outage with a new design that will allow for recirculation of water within the basin. This method will allow the station to avoid routing water flow through the cells which causes the mist to form. This header modification has already been completed on Unit #2. In addition, portable pumps will be staged ahead of fan shutdown to transfer any mist that potentially could accumulate inside the retention berm. Lastly, we will evaluate the feasibility of increasing the size of the existing concrete containment berm to allow for the storage of a larger volume of water.

Even though mist from the cooling towers is an allowable non-stormwater discharge, this notification is being submitted because DEQ has previously indicated that mist is an allowable discharge under "normal cooling tower operation". The station is currently gathering supporting information to show that this discharge falls under this category. This information will be provided to DEQ shortly.

Please contact Ken Roller of my staff at (804) 273-3494 or by email at kenneth.roller@dom.com should you have any questions or require additional information about this transmittal.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

Cathy C. Taylor
Director, Electric Environmental Services

cc:

Mr. Frank Bowman
Department of Environmental Quality
Blue Ridge Regional Office
7705 Timberlake Road
Lynchburg, VA 24502

Please send electronic renamed copy to:

Ed Baine
Pam Faggert
Sidney Bragg
Cathy Taylor
Ken Roller
Rick Woolard
Chris Dibble
Tim Hamlet
Will Solomon
Oula Shehab-Dandan

Documentum: Clover PS / Water - NPDES / Compliance Documentation/ CL VA0083097 Five Day Notification Letter